

In response to the Notice of Proposed Rule Making WT Docket 04-140:

The Federal Communications Commission has previously stated that the present holders of the Advanced Class amateur radio operator's license have exhibited a proficiency in both theory and the ability to copy the International Morse code that exceeds that presently required for the Amateur Extra Class license. The Commission has also previously "upgraded" those Technician Class licensees who were licensed prior to 21 March 1987 to General Class based on the fact that those persons had passed the same theory examination as the then General Class license and that the proficiency in use of the International Morse code was reduced to 5 word per minute. Based on these facts, it is therefore in the best interest of the Amateur Radio Service to upgrade the privileges of all Advanced Class holders to be the same as that of the Extra Class licensees.

Considering the desire of the Commission not to endure any additional administrative burden, it is proposed that the Commission maintain the present holders of the Advanced Class in the license database "as is" until the next renewal or modification of the license. At that time, the license class should be revised to show "Extra Class". Considering that it has been well over 2 years since any new Advanced Class licenses have been issued, this would mean that in less than 8 years that the additional classification of "Advanced" could be eliminated from the Commission's current records.

Again, based on the fact that present Advanced Class holders have successfully passed both a theory examination and an examination in the International Morse code that was more difficult than currently required for the Extra Class license, and based on the upgrading of those Technician Class licensees who were licensed prior to 21 March 1987 because those operators had passed the same theory examination as was then required for the General Class license and because those operators had passed the identical code requirements, it holds true to grant full privileges to the present Advanced Class operators.

This granting of full privileges will not require any action by the Commission except to modify 47 CFR Part 97.301( c ) to be identical with 47 CFR Part 97.301(b) as proposed in this Notice of Proposed Rule Making.

Therefore, these comments are respectfully submitted to the Commission.

Sincerely

Glen E. Zook, K9STH

410 Lawndale Drive  
Richardson, Texas 75080

(972) 231-3987